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5
6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

CASE NO: 3:12-cr-00010-RCJ-VPC

10 vs.

SENTENCING MEMORANDUM

11 EDWIN EARL GREEN, JR.,

12 Defendant.
13 _____/

14 COMES NOW Defendant EDWIN EARL GREEN, JR., by and through his attorney,
15 Loren Graham, and submits the following Sentencing Memorandum for the Court's consideration.
16 The sentencing hearing is currently set for June 11, 2019 at 1:45 p.m.

17 On December 9, 2018, MR. GREEN was arrested by the Washoe County Sheriff's
18 Office and charged with domestic violence. MR. GREEN had been under supervision since
19 February 4, 2016. His 36-month supervised release was due to expire on February 3, 2019, less
20 than two months after his arrest. During his supervision, he had been in compliance and had been
21 in compliance with all special conditions including community service and mental health
22 treatment. He had been employed until he became injured on the job.

23 During his supervised release, he married Jennifer Terhune on November 17, 2017.
24 Attached is a letter which MR. GREEN's wife provided to the state court for his sentencing there
25 (see Exhibit 1). Together, they have a 10-month-old son, Jamison.

26 The record before the Court verifies the struggles MR. GREEN has had dealing with
27 PTSD after serving in the United States Army. He was stationed in Saudi Arabia and Iraq during
28 the First Gulf War.

1 On May 10, 2019, MR. GREEN was sentenced in his state court case to a term of
2 imprisonment in the Nevada Department of Corrections for 19-48 months. That sentence was
3 suspended. He was placed on probation for a period not to exceed five years with regular general
4 conditions and special conditions that include participation in mental health counseling,
5 participation in alcohol treatment and counseling, abstaining from the use or possession of any
6 controlled substances, abstaining from the use or possession of any alcoholic beverages, and
7 search and seizure.

8 In order to comply with the terms of his state probation, MR. GREEN is to have a
9 mental health evaluation and a substance abuse evaluation. MR. GREEN would like to begin
10 serving his probation with the State of Nevada as soon as possible. To do this, he obviously has to
11 get his evaluations completed.

12 At this time, MR. GREEN has been incarcerated for six months and three days. He will
13 be under the supervision of the Nevada Division of Parole and Probation for a period not to
14 exceed five years. He has an employment opportunity with a fellow veteran installing CO2
15 systems in restaurants for a company that is just opening a Reno office.

16 It is respectfully requested that the Court sentence MR. GREEN to time served, six
17 months and three days, with no further federal supervision.

18 DATED: June 10, 2019

19 Respectfully submitted,

20
21 /s/ Loren Graham
22 LOREN GRAHAM, #673
23 PO Box 6329
24 Stateline, NV 89449
25 775-588-5138
26 Attorney for Defendant,
27 EDWIN EARL GREEN, JR.
28

CERTIFICATE OF SERVICE

I certify that I am an employee of LOREN GRAHAM and that on this day I caused a true and correct copy of the foregoing document described as:

SENTENCING MEMORANDUM

to be served on all parties as follows:

☒ **VIA EMAIL** where specified below.

☒ **VIA U.S. MAIL** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as indicated below, in the United states mail at Stateline, Nevada.

☐ **VIA FACSIMILE** by causing a true copy thereof to be telecopied to the number indicated below.

☐ **VIA PERSONAL DELIVERY** by causing a true copy thereof to be hand delivered on this date to the addressee(s) at the address(s) set forth below.

Addressed to:

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DATED: June 10, 2019


MARGRET PASCUS